

# Exhibit 1

**From:** [Carter, Sean](#)  
**To:** [Shen, Andrew C.](#); ["Steven R. Pounian"](#); ["zRobert Haefele"](#); [Maloney, III, Andrew](#); ["Megan Benett"](#); [Tarbutton, Joseph](#); [Goldman, Jerry](#); [WTC\[jfawcett@kreindler.com\]](#); [Kreindler, James](#); ["Nitz, Eric"](#); ["Kry, Robert"](#)  
**Cc:** [Rapawy, Gregory G.](#); [Kellogg, Michael K.](#); [Young, Christopher M.](#); [Huppert, Matthew R.](#)  
**Subject:** [EXTERNAL] RE: In re Terrorist Attacks on September 11, 2001  
**Date:** Tuesday, February 18, 2020 5:05:08 PM

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Andy –

Paragraph 9 of our draft requires service of plaintiffs' expert disclosures within 45 days of the deadline for completion of fact depositions. We intend to advocate to the Court that this is the appropriate approach, consistent with the Rules, for expert disclosures.

Best, Sean

**Sean P. Carter**

**Member | Cozen O'Connor**

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**From:** Shen, Andrew C.

**Sent:** Tuesday, February 18, 2020 3:55 PM

**To:** Carter, Sean ; 'Steven R. Pounian' ; 'zRobert Haefele' ; WTC[amaloney@kreindler.com] ; 'Megan Benett' ; Tarbutton, J. Scott ; WTC[jgoldman@andersonkill.com] ; WTC[jfawcett@kreindler.com] ; WTC[jkreindler@kreindler.com] ; 'Nitz, Eric' ; 'Kry, Robert'

**Cc:** Rapawy, Gregory G. ; Kellogg, Michael K. ; Young, Christopher M. ; Huppert, Matthew R.

**Subject:** RE: In re Terrorist Attacks on September 11, 2001

**\*\*EXTERNAL SENDER\*\***

Sean –

One issue that we started discussing, but did not finish, is the proposed deadline for the "list of the expert or experts that the parties intend to or would offer if permitted and the subject matter of their testimony." Jan. 13 Hearing Transcript, at 40. The Court instructed the parties to propose a deadline by February 21. Saudi Arabia proposes March 6. Please let us know if Plaintiffs agree.

Thanks,

Andy

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**From:** Shen, Andrew C.

**Sent:** Monday, February 17, 2020 2:45 PM

**To:** 'Carter, Sean' <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; 'Steven R. Pounian' <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; 'zRobert Haefele' <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>; Maloney, III, Andrew <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; 'Megan Benett' <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; Tarbutton, Joseph <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Goldman, Jerry <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; 'WTC[jfawcett@kreindler.com]' <[jfawcett@kreindler.com](mailto:jfawcett@kreindler.com)>; Kreindler, James <[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>; 'Nitz, Eric' <[enitz@mololamken.com](mailto:enitz@mololamken.com)>; 'Kry, Robert' <[rkry@mololamken.com](mailto:rkry@mololamken.com)>

**Cc:** Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Kellogg, Michael K. <[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>; Young, Christopher M. <[cyoung@kelloggghansen.com](mailto:cyoung@kelloggghansen.com)>; Huppert, Matthew R. <[mhuppert@kelloggghansen.com](mailto:mhuppert@kelloggghansen.com)>

**Subject:** RE: In re Terrorist Attacks on September 11, 2001

Let's have the meet and confer call tomorrow afternoon at 2:00pm eastern. Here is a dial-in:

800 768 2983

3267963

Please provide any proposed changes to the draft protocol before the call.

Thanks,  
Andy

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**From:** Shen, Andrew C.

**Sent:** Thursday, February 13, 2020 4:11 PM

**To:** 'Carter, Sean' <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; 'Steven R. Pounian' <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; 'zRobert Haefe' <[rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)>; Maloney, III, Andrew <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; 'Megan Benett' <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; Tarbutton, Joseph <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Goldman, Jerry <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; WTC[jfawcett@kreindler.com] <[jfawcett@kreindler.com](mailto:jfawcett@kreindler.com)>; Kreindler, James <[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>; Nitz, Eric <[enitz@mololamken.com](mailto:enitz@mololamken.com)>; 'Kry, Robert' <[rkry@mololamken.com](mailto:rkry@mololamken.com)>  
**Cc:** Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Kellogg, Michael K. <[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>

**Subject:** RE: In re Terrorist Attacks on September 11, 2001

Sean –

We are available on Tuesday afternoon. If there are specific provisions in the other protocol you believe to be helpful or appropriate, we are happy to discuss them. Our view is that many of the provisions in that protocol are unnecessary. The proposed protocol we sent to you also contains items that the Court expects, including deadlines for the completion of all depositions, disclosure of witnesses providing declarations, and the identification of non-party witnesses who Plaintiffs intend to depose.

To facilitate our discussion, please provide any proposed changes in advance of our meet and confer call.

Thanks,  
Andy

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**From:** Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>

**Sent:** Thursday, February 13, 2020 1:28 PM

**To:** Shen, Andrew C. <[ashen@kelloggghansen.com](mailto:ashen@kelloggghansen.com)>; 'Steven R. Pounian' <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; 'zRobert Haefe' <[rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)>; Maloney, III, Andrew <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; 'Megan Benett' <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; Tarbutton, Joseph <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Goldman, Jerry <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; WTC[jfawcett@kreindler.com] <[jfawcett@kreindler.com](mailto:jfawcett@kreindler.com)>; Kreindler, James <[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>; Nitz, Eric <[enitz@mololamken.com](mailto:enitz@mololamken.com)>; 'Kry, Robert' <[rkry@mololamken.com](mailto:rkry@mololamken.com)>  
**Cc:** Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Kellogg, Michael K. <[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>

**Subject:** [EXTERNAL] RE: In re Terrorist Attacks on September 11, 2001

Andy – We are available to confer on Tuesday, preferably in the afternoon. With regard to the document you sent, we are reviewing it but believe the deposition protocol the Court previously entered following lengthy negotiations with the merits and jurisdictional defendants and resolution by the Court of certain disputed issues provides a better baseline document for the discussions. We can discuss further when we speak. Sean

**Sean P. Carter**

**Member | Cozen O'Connor**

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**From:** Shen, Andrew C. <[ashen@kelloggghansen.com](mailto:ashen@kelloggghansen.com)>

**Sent:** Wednesday, February 12, 2020 11:00 AM

**To:** 'Steven R. Pounian' <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; 'zRobert Haefe' <[rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)>; WTC[amaloney@kreindler.com] <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; 'Megan Benett' <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; Tarbutton, J. Scott <[STarbutton@cozen.com](mailto:STarbutton@cozen.com)>; WTC[jgoldman@andersonkill.com] <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; WTC[jfawcett@kreindler.com]

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<[enitz@mololamken.com](mailto:enitz@mololamken.com)>; 'Kry, Robert' <[rkry@mololamken.com](mailto:rkry@mololamken.com)>  
**Cc:** Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Kellogg, Michael K.  
<[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>

**Subject:** RE: In re Terrorist Attacks on September 11, 2001

**\*\*EXTERNAL SENDER\*\***

Counsel –

Dallah Avco's counsel, who is copied, has requested that Dallah Avco be added as a party to the deposition protocol. Saudi Arabia has no objection to this request. To the extent that Plaintiffs have any proposed edits to the protocol, please provide them promptly and let us know your availability this week to meet and confer regarding any issues that will be presented to the Court on February 21.

Regards,

Andy

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**From:** Shen, Andrew C.

**Sent:** Friday, February 7, 2020 4:52 PM

**To:** 'Steven R. Pounian' <[Spounian@kreindler.com](mailto:Spounian@kreindler.com)>; 'zRobert Haefele' <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>;  
Maloney, III, Andrew <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; 'Megan Benett' <[Mbenett@kreindler.com](mailto:Mbenett@kreindler.com)>; 'Carter,  
Sean' <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; Tarbutton, Joseph <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Goldman, Jerry  
<[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>; 'John Fawcett' <[jfawcett@kreindler.com](mailto:jfawcett@kreindler.com)>; Kreindler, James  
<[jkreindler@kreindler.com](mailto:jkreindler@kreindler.com)>

**Cc:** Rapawy, Gregory G. <[grapawy@kelloggghansen.com](mailto:grapawy@kelloggghansen.com)>; Kellogg, Michael K.  
<[mkellogg@kelloggghansen.com](mailto:mkellogg@kelloggghansen.com)>

**Subject:** In re Terrorist Attacks on September 11, 2001

Counsel -

At the January 13, 2020 hearing, the Court directed the parties to file a proposed deposition protocol by February 21, 2020. A draft is attached. Please let us know if Plaintiffs have any proposed edits and when Plaintiffs are available to meet and confer.

Regards,

Andrew C. Shen

Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.

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